



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Mitchell E. Daniels, Jr.*  
Governor

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Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

### NOTICE OF PUBLIC MEETING

Preliminary Findings Regarding a  
New Source Review and Minor Source Operating Permit  
for AAA Galvanizing of Hamilton, IN Inc. located in Steuben County  
**MSOP No.: M151-23836-00055**

The Indiana Department of Environmental Management (IDEM) has received an application from AAA Galvanizing of Hamilton, IN Inc. for a New Source Review and Minor Source Operating Permit (MSOP) to construct and operate a hot-dip galvanization plant at 7825 S. Homestead Drive, Hamilton, Indiana 46742. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow AAA Galvanizing of Hamilton, IN Inc. to construct and operate the plant. If this source operated 365 days a year, 24 hours a day, 7 days a week, it could potentially release 33 tons per year of Particulate Matter (PM), 33.3 tons per year of Fine Particulate Matter known as PM<sub>10</sub>, 0.04 tons of Sulfur Dioxide (SO<sub>2</sub>), 0.34 tons per year of Volatile Organic Compounds (VOCs), 6.16 tons per year of Oxides of Nitrogen (NO<sub>x</sub>), 5.18 tons per year of Carbon Monoxide (CO), 4.76 tons per year of a Hydrogen Chloride (HCl), a Hazardous Air Pollutant (HAP), and 4.90 tons of total HAPs per year. A copy of the permit application and IDEM's preliminary findings are available at:

Carnegie Public Library  
322 South Wayne Street  
Angola, IN 46703-1956  
and  
IDEM's Northern Regional Office  
220 West Colfax Avenue, Suite 200  
South Bend, IN 46601-1634

A copy of the preliminary findings is available at [www.in.gov/ideM/permits/air/pending.html](http://www.in.gov/ideM/permits/air/pending.html) on the internet.

**The Indiana Department of Environmental Management (IDEM) will hold a public meeting to discuss air permitting for AAA Galvanizing of Hamilton, IN Inc. on:**

**Thursday, June 21, 2007  
5:30 p.m. (local time)  
Carnegie Public Library  
Upstairs Rooms A & B  
322 South Wayne Street  
Angola, IN 46703-1956**

### **What will happen at the public meeting?**

IDEM staff will explain the AAA Galvanizing of Hamilton, IN Inc. draft air permit and answer questions from citizens in an informal setting. The public meeting will not include formal presentations, but will give the public an opportunity to ask questions, make statements, and discuss air pollution concerns with IDEM staff. Written comments and supporting documentation can be presented at the public meeting, or if you do not plan to attend this meeting, you can send your written comments to IDEM. All written comments received will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process at 326 Indiana Administrative Code 2, air quality issues,

and technical issues. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number M151-23836-00055. **Written comments must be submitted by June 21, 2007.**

**To Contact IDEM:**

IDEM, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-6865

Pursuant to IDEM's contract with ERG, Inc., IDEM, OAQ has assigned the processing of this permit application to ERG. Therefore, questions should be directed to Bryan Lange at ERG.

**To Contact the Permit Reviewer:**

Bryan Lange at ERG  
1600 Perimeter Park Drive  
Morrisville, North Carolina 27560  
Dial Direct: 919-468-7854  
Toll Free: (800) 451-6027, ask for extension: 919-468-7854

**What will happen after IDEM makes a decision?**

Following the meeting, at the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the internet at the address indicated above, at the local library indicated above, IDEM's Northern Regional Office, 220 West Colfax Avenue, Suite 200, South Bend, IN 46601-1634 and at the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate, Indianapolis, IN 46204.

If you need reasonable accommodations to participate in the public meeting, please contact IDEM's Americans with Disabilities Act coordinator at:

Indiana State Personnel Department  
402 W. Washington St.  
Room W161  
Attn: ADA Coordinator  
Indianapolis, IN 46204-2261  
317-232-4555 (voice and TTY)

Please provide 48 hours advance notice if possible. Speech and hearing impaired callers may contact the agency and the ADA Coordinator via the Indiana Relay Service at 1-800-743-3333.

For additional information about the meeting, please contact Doug Wagner at (800) 451-6027, and ask for extension 2-0286 or via email: [dwagner@idem.in.gov](mailto:dwagner@idem.in.gov). For additional information about air permits, and how you can participate in the public process, please see **IDEM Citizen's Guide to Public Participation** and **IDEM's Permit Guide** at: <http://www.in.gov/idem/permits/guide> on the internet.

*Original Signed by*

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality



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### **NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT**

Preliminary Findings Regarding a New Source Review  
and Minor Source Operating Permit

for **AAA Galvanizing of Hamilton, IN Inc.** in **Steuben County**

MSOP: M151-23836-00055

The Indiana Department of Environmental Management (IDEM) has received an application from AAA Galvanizing of Hamilton, IN Inc. located at 7825 S. Homestead Drive, Hamilton, Indiana 46742, for a New Source Construction and Minor Source Operating Permit (MSOP). IDEM's Office of Air Quality (OAQ) issues this type of permit to regulate the construction and operation of new sources, and modifications at existing sources that release air pollutants.

IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several associated documents, that would allow AAA Galvanizing of Hamilton, IN Inc. to construct and operate a hot-dip galvanization plant. If this source operated 365 days a year, 24 hours a day, 7 days a week, it could potentially release 33.0 tons of PM, 33.3 tons of PM<sub>10</sub>, 0.04 tons of SO<sub>2</sub>, 0.34 tons of VOC, 5.18 tons of CO, 6.16 tons of NO<sub>x</sub>, 4.76 tons of HCl, and 4.90 tons of total HAP per year.

A copy of the permit application and IDEM's preliminary findings are available at:

Carnegie Public Library  
322 South Wayne Street  
Angola, Indiana 46703-1956  
And

Northern Regional Office  
220 W. Colfax Ave., Ste 200  
South Bend, IN 46601-1634

A copy of the preliminary findings is available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).

#### **How can you participate in this process?**

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this draft permit. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM may hold a public hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and

location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation or a request for a public hearing should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number M151-23836-00055 in all correspondence.

**Contact IDEM at:**

IDEM, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(800) 451-6027 (ask for extension 3-6878)

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this permit application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mr. Bryan Lange of ERG.

**To contact the Permit Reviewer:**

Bryan Lange  
ERG  
1600 Perimeter Park Drive  
Morrisville, North Carolina 27560  
Dial directly: 919-468-7854  
E-mail: Bryan.Lange@erg.com

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate, Indianapolis, and the Northern Regional Office.

If you have any questions please contact Mr. Bryan Lange at the above address.

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

For additional information about air permits, and how you can participate, please see IDEM Citizens' Guide to Public Participation and Permit Guide on the Internet at: [www.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).

**ERG/BL**



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

DRAFT

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

## **New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY**

**AAA Galvanizing of Hamilton, IN Inc.  
7825 S. Homestead Drive  
Hamilton, Indiana 46742**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M151-23836-00055	
Issued by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary hot-dip galvanization plant.

Source Address:	7825 S. Homestead Drive, Hamilton, Indiana 46742
Mailing Address:	625 Mills Road, Joliet, IL 60433
General Source Phone Number:	(815) 723-5000
SIC Code:	3479
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas-fired heater, constructed in 2001, rated at 0.2 MMBtu/hr venting to the atmosphere.
- (b) Four (4) natural gas-fired heaters (H1-H4), constructed in 2001, each rated at 1.5 MMBtu/hr venting to the atmosphere.
- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.
- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (f) Four (4) natural gas-fired heaters, permitted to be constructed in 2007, each rated at 1.2 MMBtu/hr venting to the atmosphere.
- (g) Two (2) natural gas-fired generators, permitted to be constructed in 2007, rated at 1.35 MMBtu/hr and 2.0 MMBtu/hr respectively, venting to the atmosphere.
- (h) Six (6) hydrochloric acid tanks, constructed in 2001, and exhausting indoors.



## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M151-23836-00055, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-3-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.5 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.6 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

**B.7 Severability**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.8 Property Rights or Exclusive Privilege**

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This permit does not convey any property rights of any sort or any exclusive privilege.

**B.9 Duty to Provide Information**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.10 Certification**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue,  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M151-23836-00055 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.15 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.17 Source Modification Requirement**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.18 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.20 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.21 Credible Evidence [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.8 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.



## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

## **Corrective Actions and Response Steps**

### **C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.14 Malfunctions Report [326 IAC 1-6-2]**

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the galvanizing kettle (Kettle 45') shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15.0 tons per hour. The galvanizing kettle (Kettle 23') shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10.0 tons per hour. The pounds per hour limitation is calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

## SECTION D.2

## EMISSIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (h) Six (6) hydrochloric acid tanks, constructed in 2001, and exhausting indoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Compliance Determination Requirements

#### D.2.1 Testing Requirements [326 IAC 2-1.1-11]

In order to verify the emission factor for HCL, the Permittee shall perform hydrogen chloride (HCl) testing for the hydrochloric acid tank operations utilizing methods as approved by the Commissioner and within one hundred eighty (180) days after issuance of this permit. Testing shall be conducted in accordance with Section C – Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	AAA Galvanizing of Hamilton, IN Inc.
<b>Address:</b>	7825 S. Homestead Drive
<b>City:</b>	Hamilton, Indiana 46742
<b>Phone #:</b>	(815) 723-5000
<b>MSOP #:</b>	M151-23836-00055

I hereby certify that AAA Galvanizing of Hamilton, IN Inc. is : ☐ still in operation.

I hereby certify that AAA Galvanizing of Hamilton, IN Inc. is : ☐ no longer in operation.  
☐ in compliance with the requirements of MSOP M151-23836-00055.  
☐ not in compliance with the requirements of MSOP M151-23836-00055.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF MALFUNCTION AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: AAA Galvanizing of Hamilton, IN Inc.  
Source Address: 7825 S Homestead Drive, Hamilton, IN 46742  
MSOP No.: 151-23836-00055

**This certification shall be included when submitting any application form, report, compliance monitoring, or other documents as required by the applicable requirements in this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)\_\_\_\_\_
- ☐ Report (specify)\_\_\_\_\_
- ☐ Notification (specify)\_\_\_\_\_
- ☐ Affidavit (specify)\_\_\_\_\_
- ☐ Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue

AAA Galvanizing of Hamilton, IN Inc.  
7825 S. Homestead Drive,  
Hamilton, IN 46742

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that AAA Galvanizing of Hamilton, IN Inc. 7825 S. Homestead Drive, Hamilton, IN 46742 completed construction of the two (2) kettles and eight (8) acid dip tanks on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 31, 2006 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. CP- 151-23836-00055, Plant ID No. 151-00055 issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires:

Signature \_\_\_\_\_

\_\_\_\_\_  
Name (typed or printed)

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a New Source Review and Minor Source  
Operating Permit (MSOP)**

**Source Background and Description**

Source Name:	AAA Galvanizing of Hamilton, IN Inc.
Source Location:	7825 S. Homestead Dr, Hamilton, IN 46742
County:	Steuben
SIC Code:	3479
Operation Permit No.:	M151-23836-00055
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed an application from AAA Galvanizing of Hamilton, IN Inc. relating to the construction and operation of hot-dip galvanization plant.

**History**

This hot-dip galvanization plant has been operating under a Registration 151-13817-00055 issued March 14, 2001. The original construction included six (6) hydrochloric acid dip tanks. An application to modify the source was received on October 31, 2006. This Permittee has proposed the replacement of kettle S1 with a new kettle (Kettle 45'), the installation of a second kettle (Kettle 23'), and the installation of an additional eight (8) acid dip tanks. The modification increases the source potential to emit PM/PM10 above twenty-five (25) tons per year. Therefore, this source is now being permitted under the provisions of 326 IAC 2-6.1 (Minor Source Operating Permit).

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas-fired heater, constructed in 2001, rated at 0.2 MMBtu/hr venting to the atmosphere.
- (b) Four (4) natural gas-fired heaters (H1-H4), constructed in 2001, each rated at 1.5 MMBtu/hr venting to the atmosphere.

**New Emission Units and Pollution Control Equipment**

- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.
- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (f) Four (4) natural gas-fired heaters, permitted to be constructed in 2007, each rated at 1.2 MMBtu/hr venting to the atmosphere.

- (g) Two (2) natural gas-fired generators, permitted to be constructed in 2007, rated at 1.35 MMBtu/hr and 2.0 MMBtu/hr respectively, venting to the atmosphere.

#### **Unpermitted Emission Units and Pollution Control Equipment**

- (h) Six (6) hydrochloric acid tanks, constructed in 2001, exhausting indoors.

#### **Existing Approvals**

The source has been constructed and operated under the Registration 151-13817-00055, issued on March 14, 2001.

None of the provisions of this permit are being carried over at this time. The requirements of 326 IAC 2-5.5 (Registrations) will no longer be applicable to this source after issuance of this MSOP.

#### **Enforcement Issue**

The facilities original registration should have included the six (6) acid dip tanks, installed in 2001.

#### **Stack Summary**

There are no process stacks associated with any facilities at this source.

#### **Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 31, 2006, with additional information received on January 10, 2007.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations in Appendix A, pages 1 through 5.

#### **Potential to Emit of the Source Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	33.0
PM-10	33.3
SO <sub>2</sub>	0.04
VOC	0.34
CO	5.18
NO <sub>x</sub>	6.16

HAPs	Potential to Emit (tons/yr)
HCI	4.76
Total	4.90

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit of PM and PM-10 is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

### County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

**Note:** On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Steuben County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) emissions and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (c) Steuben County has been classified as attainment or unclassifiable in Indiana for PM, PM10, NO<sub>2</sub>, SO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to

the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

(d) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions based on U.S. EPA's FIRE 6.25, October 18, 2004 and reference material published by Metal Finishing Association of Southern California (MFASC)):

Pollutant	Emissions (tons/yr)
PM	33.0
PM-10	33.3
SO <sub>2</sub>	0.04
VOC	0.34
CO	5.18
NO <sub>x</sub>	6.16
HCl	4.60
Combination HAPs	4.90

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on calculations contained in Appendix A of this document.

### Proposed Modification

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	22.0	22.3	-	-	-	-
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Combustion	0.12	0.47	0.04	0.34	5.18	6.16	0.12
Kettles	32.9	32.9	-	-	-	-	0.03
Acid Tanks	-	-	-	-	-	-	HCl = 4.76
Total Emissions	33.0	33.3	0.04	0.34	5.18	6.16	Combination = 4.90 HCl = 4.76

"-" = Negligible emissions.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 151-23836-00055, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source and the calculations provided in Appendix A.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T (326 IAC 20 and 40 CFR 63.460) because it does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

### State Rule Applicability – Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County, is not required to operate under a Part 70 Permit, and does not have the potential to emit greater than or equal to five (5) tons per year of lead. Therefore, this source is subject only to the additional information requests under 326 IAC 2-6-5.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of AAA Galvanizing of Hamilton, IN Inc will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Steuben County and was constructed after December 13, 1985. Pursuant to 326 IAC 6-5-1(b), this source is exempt from the requirements of 326 IAC 6-5.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

### State Rule Applicability – Galvanizing Kettles

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the galvanizing kettle (Kettle 45') shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15.0 tons per hour. The galvanizing kettle (Kettle 23') shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10.0 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission calculations based on AP-42 factors indicate that each emission unit is able to comply with this limit without using a control device.

### **State Rule Applicability – Process Heaters**

#### **326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)**

The natural gas heaters are not a source of indirect heating. Therefore, this source is not subject to the provisions of 326 IAC 6-2.

#### **326 IAC 6-3 (Fugitive Particulate Matter Emission Limitations)**

Pursuant to 326 IAC 6-3-1(b)(14), 325 IAC 6-3 does not apply to the natural gas heaters because these processes each have a potential to emit of less than five hundred fifty-one thousandths (0.551) pounds per hour of PM.

### **Testing Requirements**

The Metal Finishing Association of Southern California (MFASC) has published a report, *Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry* (April, 1999) that demonstrate the hydrochloric acid tanks potential to emit hydrogen chloride (HCl) emissions are less than HAP major source thresholds. These factors render the requirements of 326 IAC 2-7 (Title V) not applicable.

In order to demonstrate compliance with the applicability criteria under 326 IAC 2-5.1-3(a) the Permittee shall verify the MFASC factors. Within one hundred and eighty (180) days after the issuance of the permit, the Permittee shall perform HCl testing on the hydrochloric acid tank operations using methods approved by the Commissioner. All testing shall be conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring**

No monitoring is required for this type of operation.

### **Conclusion**

The construction and operation of this hot-dip galvanization plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 151-23836-00055.



**Appendix A: Emission Calculations  
Emissions Summary**

Page 1 of 5 TSD App A

**Company Name:** AAA Galvanizing of Hamilton, IN Inc.  
**Address:** 7825 S. Homestead Dr, Hamilton, IN 46742  
**Registration:** 151-23836-00055  
**Reviewer:** ERG/BL  
**Date:** November 10, 2006

	Potential To Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NOx	HCl	Combined HAPs
Combustion	0.12	0.47	0.04	0.34	5.18	6.16	-	0.12
Kettles	32.9	32.9	-	-	-	-	-	0.03
Acid Tanks	-	-	-	-	-	-	4.76	4.76
<b>Total</b>	<b>33.0</b>	<b>33.3</b>	<b>0.04</b>	<b>0.34</b>	<b>5.18</b>	<b>6.16</b>	<b>4.76</b>	<b>4.90</b>

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

Page 2 of 5 TSD App A

**Company Name:** AAA Galvanizing of Hamilton, IN Inc.  
**Address:** 7825 S. Homestead Dr, Hamilton, IN 46742  
**Registration:** 151-23836-00055  
**Reviewer:** ERG/BL  
**Date:** November 10, 2006

Heat Input Capacity  
MMBtu/hr  
14.4

Potential Throughput  
MMSCF/yr  
123.2

Pollutant						
	PM*	PM10*	SO <sub>2</sub>	NOx	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	0.12	0.47	0.04	6.16	0.34	5.18

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF = 1,000,000 Standard Cubic Feet of Gas

**Methodology**

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF)/2,000 lb/ton

**Appendix A: Emission Calculations**  
**HAPs Emissions from Natural Gas Combustion**  
**MM BTU/HR <100**

Page 3 of 5 TSD App A

**Company Name:** AAA Galvanizing Inc.  
**Address:** 7825 S Homestead Dr Hamilton IN 46742  
**Registration:** 151-23836-00055  
**Reviewer:** ERG/BL  
**Date:** November 10, 2006

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential to Emit (tons/yr)	1.29E-04	7.39E-05	4.62E-03	1.11E-01	2.10E-04

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	3.08E-05	6.78E-05	8.63E-05	2.34E-05	1.29E-04

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
Galvanizing Kettle**

**Company Name:** AAA Galvanizing of Hamilton, IN Inc.  
**Address:** 7825 S. Homestead Dr, Hamilton, IN 46742  
**Registration:** 151-23836-00055  
**Reviewer:** ERG/BL  
**Date:** November 10, 2006

	Maximum Kettle Capacity (lbs/hr)	Maximum Operation (hrs/yr)	Maximum Zinc * Consumption (tons/yr)	Emission Factor (pounds of PM per ton of Zinc consumed)	Emission Factor (pounds of Cadmium per ton of Zinc consumed)	PTE of PM (lb/hr)	PTE of PM (tons/yr)	PTE of Cadmium (tons/yr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Kettle 45'	30,000	8,760	7,884	5.00	4.00E-03	4.50	19.7	0.02	25.2
Kettle 23'	20,000	8,760	5,256	5.00	4.00E-03	3.00	13.1	0.01	19.2
Total							<b>32.9</b>	<b>0.03</b>	

\* The amount of zinc coating used by the Permittee is 6% of the maximum kiln process weight.  
The emission factors have been taken from FIRE version 6.25 (SCC 3-04-008-05).

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

**Methodology**

Maximum Zinc Consumption (tons/yr) = Maximum Kettle Capacity (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs x Zinc coating usage (6%)

Potential to Emit Particulate (lbs/hr) = Maximum Zinc Consumption (tons/yr) x Emission factor (5 lbs/ton of zinc used) x 1 yr/8760 hrs

Potential to Emit Particulate (tons/yr) = Maximum Zinc Consumption (tons/yr) x Emission factor (5 lbs/ton of zinc used) x 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**HCl Emissions from the Acid Tank**

Page 5 of 5 TSD App A

**Company Name:** AAA Galvanizing of Hamilton, IN Inc.  
**Address:** 7825 S. Homestead Dr, Hamilton, IN 46742  
**Registration:** 151-23836-00055  
**Reviewer:** ERG/BL  
**Date:** November 10, 2006

HCl Pickling Factor (lb/(hr-ft<sup>2</sup>tank-%HCl))      0.00003 (a)  
HCl Solution (%)      14

	Surface Area (ft <sup>2</sup> )	Emission Rate (lb/hr)	Max HCl Emissions (tons/yr)
23' Kettle	966	0.41	1.78
45' Kettle	1,620	0.68	2.98
Total			4.76

**Acid Tank Specifications**

	W (ft)	L (ft)	D (ft)	Surface Area (ft <sup>2</sup> )
<b>23' Kettle</b>				
Acid Tank #3	7	23	5	161
Acid Tank #4	7	23	5	161
Acid Tank #5	7	23	5	161
Acid Tank #6	7	23	5	161
Acid Tank #7	7	23	5	161
Acid Tank #8	7	23	5	161
<b>45' Kettle</b>				
Acid Tank #3	6	24	13	144
Acid Tank #4	6	24	13	144
Acid Tank #5	6	50	13	300
Acid Tank #8	6	24	13	144
Acid Tank #9	6	24	13	144
Acid Tank #10	6	24	13	144
Acid Tank #12	6	50	12.5	300
Acid Tank #13	6	50	12.5	300

(a) HCl emissions are based on "Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry," April, 1999, published by the Metal Finishing Association of Southern California (MFASC). Factors were developed from stack testing results conducted in California's South Coast Air Quality Management District (SCAQMD).

**Methodology**

Surface Area (ft<sup>2</sup>) = Length (ft) x Width (ft)

PTE of HCl (tons/yr) = Emission Factor (lb/(hr-ft<sup>2</sup>tank-%HCl)) x Surface Area (ft<sup>2</sup>) \* HCl Solution (%) x 8760 hr/yr x 1 ton/2000 lbs